

DOCKET FILE COPY ORIGINAL

RECEIVED

CROWELL & MORING

1001 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20004-2595

(202) 624-2500

CABLE: CROMOR

FACSIMILE (RAPICOM): 202-628-5116

W. U. I. (INTERNATIONAL) 64344

W. U. (DOMESTIC) 89-2448

JUN 18 1993

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

SUITE 1200

2010 MAIN STREET

IRVINE, CALIFORNIA 92714-7217

(714) 263-8400

FACSIMILE (714) 263-8414

1 SERJEANTS' INN

LONDON EC4Y 1LL

44-71-936-3036

FACSIMILE 44-71-936-3035

June 18, 1993

**Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554**

Re: MM Docket No. 93-114

Dear Ms. Searcy:

Transmitted herewith for filing with the Commission on behalf of VideoIndiana, Inc., are an original and four copies of its Comments in the above-referenced proceeding.

Should there be any questions regarding these comments, please communicate with this office.

Very truly yours,

John T. Scott, III

John T. Scott, III

Enclosures

No. of Copies rec'd
List A B C D E

044

JUN 18 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Review of the Commission's
Rules Governing the Low
Power Television Service

)
)
)
)
)
MM Docket No. 93-114

COMMENTS OF VIDEOINDIANA, INC.

VideoIndiana, Inc., by its attorneys and pursuant to Section 1.415 of the Commission's Rules, hereby supports the Commission's proposed changes to the Rules governing the Low Power Television Service set forth in its Notice of Proposed Rulemaking (FCC 93-187, released April 22, 1993).

VideoIndiana is the licensee of LPTV Station W27AR, which

programming sources in order to survive, modifying the Rules to strengthen low-power service is clearly in the public interest.

VideoIndiana supports in particular the Commission's proposal to assign standard full-power station call signs to LPTV stations. VideoIndiana's ability to develop W27AR has been hindered by the awkward five-figure letter-number call sign which is assigned to the station, a problem that exists for each LPTV station. Viewers are unaccustomed to such call signs, which are difficult to promote. Moreover, most audience rating surveys do not accommodate LPTV call sign designations. For this reason, viewer levels for low power stations are not accurately tabulated, further impairing efforts to establish a low power station's viability.

In its Notice the Commission proposed two options for assigning call signs. Option 1 would condition grant of standard four-letter call signs on the station's compliance with minimum hours of operation and local program origination; Option 2 would award standard call signs to all licensed LPTV stations. VideoIndiana strongly supports Option 2. Tying grant of a standard call sign to station programming would, as the Commission acknowledges, require a complicated and ongoing review process at the Commission which would further burden its already strained resources. Moreover, the Commission has not imposed Option 1's approach on any other service or, for example, on satellite stations that originate little or no programming. Finally, Option 1, by precluding stations from receiving four-letter call signs until they meet minimum program standards, would leave in place one of the very problems which has contributed to the slow growth of LPTV

as a viable service, and thereby undermine one of the goals of this proceeding.

In sum, the Commission's proposed modifications to the Rules for low power television service should be adopted, and all licensed low power stations should be assigned standard four-letter call signs.

Respectfully submitted,

VIDEOINDIANA, INC.

By: John T. Scott, III
John T. Scott, III
CROWELL & MORING
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 624-2500

Its Attorneys

Dated: June 18, 1993